

**McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP**

570 Broad Street

Suite 1500

Newark, New Jersey 07102

(973) 622-7711

Attorneys for Defendant

State Farm Mutual Auto Insurance Company

88 Pine Street

24th Floor

New York, New York 10005

(212) 483-9490

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK**

**DAWN HAMPSON,**

**Plaintiff,**

**v.**

**STATE FARM MUTUAL AUTO  
INSURANCE COMPANY,**

**Defendant.**

DOCUMENT FILED ELECTRONICALLY

Civil Action No.: 12-cv-0258 (BKS/CFH)

**AMENDED EXHIBIT LIST**

Defendant, State Farm Mutual Auto Insurance Company (“State Farm”), identifies the following potential exhibits for trial, other than those that may be used solely for impeachment purposes. By listing any exhibit, State Farm does not thereby take the position that it is admissible into evidence or admissible for all purposes, and does not waive any argument regarding the admissibility or limited admissibility of any exhibit. State Farm reserves the right to identify any additional exhibits required to address any matters raised by Plaintiff at trial.

MCELROY, DEUTSCH, MULVANEY & CARPENTER, LLP  
Attorneys for Defendant  
State Farm Mutual Automobile Insurance Company

/s/ Francis X. Dee  
By: \_\_\_\_\_  
Francis X. Dee  
A Member of the Firm

Dated: September 25, 2015

United States District Court  
for the Northern District of New York

Case No. 12-cv-0258 (*Hampson v. State Farm Mut. Auto Ins. Co.*)

Date: September 21, 2015

Presiding Judge: Hon. Brenda K. Sannes, U.S.D.J.

( ) Plaintiff

( x ) Defendant

( ) Court

Exhibit No.	Marked for Identification	Admitted into Evidence	Remarks	Witness	Exhibit Description
1					Plaintiff's Response to Interrogatories
2					Performance evaluation 5/04-5/05
3					Diaz memo 8/31/05
4					Performance evaluation 3/05-2/06
5					Diaz memo 8/14/06
6					Diaz memo 1/26/07
7					Performance evaluation 3/06-3/07
8					Performance evaluation 3/06-3/07 signature page
9					Performance evaluation 4/08
10					Diaz memo 11/17/08
11					Performance evaluation 4/08-3/09
12					Performance evaluation 3/09-2/10
13					Diaz memo 5/26/10
14					Diaz memo 11/29/10
14A					Draft Diaz memo 11/11/10
14B					Draft Diaz memo 11/12/10
15					Performance evaluation 4/10-3/11
16					Policies from US HR Policy Manual
16A					Policy – Accommodation Requests under ADA
16B					Policy – Accommodation Requests under ADA 2/22/10
16C					ADA Accommodation Request and Questionnaire
16D					ADA Management Questionnaire
16E					Policy – Paid Sick Leave
16F					Policy – FMLA Leave

17				Diaz memo 3/29/11
17A				Diaz draft memo 3/28/11
17B				Diaz draft memo 3/29/11
17C				Diaz draft memo 3/16/11
18				Position Description
19				Diaz email 12/2/05
20				Diaz Drop File note 7/27/05
21				Diaz notes 9/28 and 11/2/05
22				Diaz notes 12/6/05
23				Diaz Drop File note 7/20/06
24				Diaz email 9/19/06
25				Diaz note 12/5/06
26				Diaz Drop File note 12/5/06
27				Diaz note 1/10/07
28				Diaz note 3/23/07
29				Diaz note 4/8/08
30				Diaz email 8/16/10
31				Email 3/9/10
32				Payne email 11/11/10
33				Bertrand email 12/9/10
34				Diaz email 1/12/11
35				Bertrand email and note 1/31/11
36				Bertrand email 2/17/11
37				Bertrand email 2/17/11
38				Grant notes 5/18/10 ff.
39				Grant email 6/10/10
40				Grant notes 9/29/10
41				Grant email 11/11/10
42				Grant email 11/16/10
43				Grant notes 11/29/10
44				Grant notes 1/12/11
45				Grant notes 1/13/11
46				Grant notes 1/17/11
47				Grant notes 4/7/11
48				Payne email 4/7/11
49				Supervisor Evaluation of Terminating Employees 4/11
50				Monroe email 5/7/07
51				Monroe letter 5/8/07
52				Monroe email 3/28/08
53				Monroe email 10/27/09
55				Monroe email 3/3/10
56				Monroe letter 3/5/10
57				Monroe email 3/19/10
58				Medical Absences at State Farm
60				FMLA requests
61				Job History for Dawn Hampson
62				Enterprise Absence System report 2/21/11

63				Enterprise Absence System report 8/11/11
63A				Summary of Enterprise Absence System Report 2006-2011 -- Calendar of Plaintiffs' Absences
63B				Summary of Enterprise Absence System report
63C				Working days 2006-2011
64				Enterprise Absence System report 3/28/11
65A				Plaintiff's tax return 2011
65B				Plaintiff's tax return 2012
65C				Plaintiff's tax return 2013
65D				Plaintiff's tax return 2014
66				Plaintiff's response to document requests
67A				Plaintiff's 2012 Earnings Statements
67B				Plaintiff's 2013 Earnings Statements
68				Plaintiff's job application documents
69				Plaintiff's supplemental response to document requests
69A				Plaintiff's supplemental documents to DR#8 – Aug. 12, 2015 Social Security Administration letter and Social Security Benefit Statements for 2013 and 2014
69B				Plaintiff's supplemental documents to DR#7 – W-2 forms for 2012, 2013, and 2014
70				Plaintiff's supplemental responses to interrogatories
71				Retirement plan letter 5/23/11
72A				SSDI Application
72B				SSDI Determination
72C				SSA notice 10/30/12
72D				SSA notice 1/18/13
72E				SSA notice 9/2/13
73A				COBRA notice 5/6/11
73B				COBRA notice 10/6/11
73C				COBRA notice 12/6/11
73D				COBRA notice 9/3/12
73E				COBRA certificate 9/3/12
73F				COBRA notice 4/28/11
74				Plaintiff's bankruptcy petition
75				Charge of Discrimination 6/3/11

76				EEOC Determination 12/11
77				Verified Complaint
78				Plaintiff's Affidavit, 2/19/14
90				Medical Records – Schenectady Neurological Consultants (for identification only)
90A				Headache calendar (from Schenectady Neurological Consultants records)
91				Medical Records – Albany Center for Pain Management (for identification only)
92				Medical Records – Manuel Astruc, M.D. (for identification only)
93				Medical Records – Eugene Merecki, M.D. (for identification only)
94				Medical Records – Saratoga-Schenectady Gastroenterology (for identification only)
95				Medical Records – Bick Wanck, M.D. (for identification only)
96				Medical Records – Schenectady Neurological Consultants (2015)
97				Medical Records – Manuel Astruc, M.D. (2015) (for identification only)
98				Medical Records – Saratoga-Schenectady Gastroenterology (2015) (for identification only)
99				Medical Records – Eugene Merecki, M.D. (2015) (for identification only)
100				Medical Records – Albany Ctr. Rheumatology (2015) (for identification only)

Exhibits Returned to Counsel (Date): \_\_\_\_\_

Signature: \_\_\_\_\_